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June 30, 2000

George J. Malosh Brookhaven Group Manager U. S. Department of Energy Building 464 Upton, New York 11973

SUBJECT: Integrated Safety Management System Improvement Plan

Reference: Letter Malosh to Marburger, Brookhaven National Laboratory Integrated Safety Management

System (ISMS) Approval, dated June 9, 2000

Dear Mr. Malosh:

In Dr. San Martin's ISMS approval letter he requested BNL provide a plan and schedule to address the five areas of improvement identified in the ISMS verification report. These are:

- At the Institutional level, the self-assessment system needs strengthening. Institutional expectations for management system assessments have not been developed. As a result Management cannot be assured that a comprehensive set of management assessments are being conducted. Analyses of causal factors and trends generally are not implemented on a Laboratory-wide level on self-assessment results. These results are needed for use in other institutional elements for corrective action, trending and causal-factor analyses, lessons-learned, Occupational Medicine, and the Price Anderson Amendments Act (PAAA) program.
- The overall Laboratory-wide awareness and use of the Lessons-learned program is low. Processes to enhance feedback and improvement need further development within the SBMS to link Lessons-learned to the work planning and training systems. Valuable information is available in self-assessments and external (non-BNL) reviews, but the information is not being robustly captured for feedback and improvement, such as from the work permit process, and lessons-learned communications across the entire Laboratory. A Laboratory-wide, employee-suggestion system will help involve workers in the feedback improvement processes.
- The corrective action process at the institutional level needs to be strengthened. There does not appear to be a process to ensure that immediate actions to control hazards are being taken while longer-term corrective actions to address root- and causal- factors are being developed. A large percent of those items being tracked are past due. Not all items that may have institutional-level implications have been included in the Laboratory-wide tracking system. A significant number of open corrective items are not being completed on a timely basis.
- The Quality Program is in transition with large variability in implementation across the Laboratory. Recently, BNL management's attention intensified and improvement actions are to be demonstrated.
- Where priority on the work, hazards, controls, work-execution functions has been demonstrated, it is now appropriate to bring BNL's and BHG's focus on the feedback and improvement loop of ISMS. The ISMS framework looks to the design and execution of this loop wherein the measures for demonstrating performance are considered early in the processes of work definition/hazard identification and control. Improvement is needed in tying the feedback loop into the up-front thinking of ISMS at BHG/BNL.

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These opportunities for improvement are consistent with those identified by the Laboratory in our pre-ISM Verification self-assessment. They largely reflect the state of maturity of the Laboratory's self-assessment and quality programs. In essence, we are in year 2 of a planned 5 year maturation process for our Laboratory—wide self-assessment program.

Within this program, feedback and improvement processes will continue to be developed and improved over the next several years. The Laboratory's current improvement plans for the self-assessment program include formalization of institutional requirements through an SBMS subject area, scheduled for completion 9/30/00. This will ensure its availability for FY 01 assessment planning. We will also enhance the process connections to programs such as the Laboratory Lessons-Learned and the Price-Anderson Amendments Act programs. While some connections have already been established, we plan to fully implement these improvements by 3/30/01. Substantial resource commitment has also been made to improve corrective action management processes including the development and implementation of the Assessment Tracking System (ATS). An institutional level system was implemented in May 00. The ATS is now being provided to Laboratory Departments and Divisions to give them the same corrective action management processes and tools that are integrated with the institution-wide system. We expect this system to be available to Departments and Divisions by 9/30/00. In accordance with FY 00 Critical Outcome Performance measures, a comprehensive evaluation of the Integrated Assessment Program will be conducted. This evaluation accounts for 80% of the evaluation score for the Integrated Assessment Program. Progress towards implementing the improvements described above will be specifically addressed in the evaluation.

Improvements to the Quality Program are being managed through the Laboratory's Quality Improvement Project. DOE-BHG has been substantially involved in this project.

Consistent with the principles of Performance-Based Management, we will continue to use the Critical Outcome Trees to drive the Laboratory's Improvement Agenda. Improvements to the Laboratory's Integrated Assessment and Quality Programs are already captured in the FY01 Performance Measures. Specific measures are also included for the Integrated Safety Management System. If BHG determines that the Critical Outcome measures for FY 01 will not adequately address needed improvements to feedback and improvement processes, then we should revise those measures to allow the Laboratory to appropriately prioritize improvement initiatives and be fully responsive to the DOE expectations.

The improvements indicated in the five specific areas discussed above as well as the other opportunities for improvement identified in the ISM Verification report are addressed within Appendix C of the Integrated Safety Management Program Description. The issues are prioritized and aligned with the management systems through which the issue will be resolved. Space for reporting status and action is provided for each issue, Laboratory quarterly assessments evaluate ISM status and progress towards achieving system improvements. The performance of these assessments is tracked through the Laboratory's Assessment Tracking System. They include BHG involvement. The next assessment is scheduled for July 2000.

We are pleased that Dr. San Martin emphasized and reinforced the Laboratory's commitment to maintain momentum in improving our performance in these areas. We are confident that our plans fully address these issues.

If you have any additional questions, please contact Doug Ports on extension 2262.

John H. Marburger,

Director

DP/si

cc:

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Ref: CC2000-1072